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5 *Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

6 **IN THE UNITED STATES DISTRICT COURT**  
7 **FOR THE DISTRICT OF NEVADA**

8 DAVID WOODRING,  
9 Plaintiff,  
10 v.  
11 EXPERIAN INFORMATION SOLUTIONS,  
12 INC., EQUIFAX INFORMATION SERVICES,  
13 LLC, NAVIENT, and NEW YORK STATE  
14 BOARD OF HIGHER EDUCATION,  
15 Defendants.

Case No. 2:19-cv-00030-JAD-VCF

**STIPULATION AND ORDER  
EXTENDING DEADLINE FOR NAVIENT  
TO FILE AN ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(SECOND REQUEST)**

16 Plaintiff DAVID WOODRING ("Plaintiff") and Defendant NAVIENT SOLUTIONS,  
17 LLC, incorrectly named NAVIENT in the Complaint, by and through their respective counsel,  
18 stipulate and agree to extend the deadline from the current deadline of February 22, 2019 (ECF  
19 No. 13) to March 9, 2019, for Defendant NAVIENT SOLUTIONS, LLC ("NSL"), to File an  
20 Answer or Otherwise Respond to Plaintiff's Complaint (ECF No. 1).

21 On January 4, 2019, Plaintiff filed his Complaint. The claims at issue necessitate additional  
22 time for fact-finding, and the parties have been discussing the documents necessary to determine  
23 their respective claims and defenses in order to try and resolve this case. Further, NSL is in the  
24 process of acquiring additional documents, based on conversations with Plaintiff, so that it can  
25 meaningfully respond to the specific allegations contained in Plaintiff's Complaint. Plaintiff has  
26 no opposition to NSL's request for an extension until March 9, 2019 to file an answer or otherwise  
27 respond to Plaintiff's Complaint. Moreover, NSL participated in the 26(f) conference with  
28

1 Plaintiff, and the extension should not impact any of the deadlines in the Stipulated Discovery Plan  
2 and Scheduling Order that will soon be filed by the parties.

3 This is the second stipulation for extension of time for NSL to respond to Plaintiff's  
4 Complaint and is being made in good faith and not for purposes of undue delay. No additional  
5 requests for extensions are contemplated.

6 **IT IS SO STIPULATED.**

7 Dated this 21st day of February, 2019.

8 **HOLLEY, DRIGGS, WALCH, FINE,**  
9 **WRAY, PUZEY & THOMPSON**

10 */s/ Michael R. Ayers* \_\_\_\_\_  
11 JAMES W. PUZEY, ESQ.  
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16 *Attorneys for Defendant NAVIENT SOLUTIONS, LLC*

17 Dated this 21st day of February, 2019.

18 **KNEPPER & CLARK LLC**

19 */s/ Miles Clark* \_\_\_\_\_  
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22 Suite 170-109  
23 Las Vegas, Nevada 89129  
24 *Attorneys for Plaintiff*

25 **ORDER**

26 The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up  
27 to and including March 9, 2019 is so ORDERED AND ADJUDGED.

28 Dated this 21st day of February, 2019.

  
29 **UNITED STATES MAGISTRATE JUDGE**

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of January, 2019, I served a copy of the foregoing **STIPULATION AND ORDER EXTENDING DEADLINE FOR NAVIENT TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** upon the party below via electronic service through the United States District Court for the District of Nevada's ECF system:

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By: /s/ SUSAN M. MATEJKO

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